

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

**JOINT MOTION TO EXTEND
LIMITATION ON LENGTH OF
BRIEFS**

Plaintiff Students for Fair Admissions and the UNC-Defendants jointly move this Court for leave to exceed the word count limitation set forth in Rule 7.3(d) of the Rules of Practice and Procedure of the United States District Court for the Middle District of North Carolina with respect to the briefs supporting their forthcoming motions for summary judgment (currently due September 21, 2018) and responsive briefs (currently due November 5, 2018).

In support of this Motion, the parties state as follows:

1. Plaintiff filed its complaint on November 17, 2014.
2. Plaintiff's complaint is 65 pages in length and makes numerous factual allegations relating to Plaintiff's requested relief that Defendant the University of North Carolina at Chapel Hill be permanently enjoined from the use of race in its undergraduate admissions process. Discovery in this case has been extensive – Plaintiff and the UNC-Defendants produced over 300,000 pages of documents and took 18 fact witness

depositions. The parties also exchanged three rounds of expert reports from a total of 7 experts (including those of Defendant-Intervenors), and deposed each expert.

3. Based on the complexity of this litigation and the critical importance of the constitutional issues being litigated, Plaintiff and the UNC-Defendants respectfully request an enlargement of the word count limitation for briefs filed in support of any motion for summary judgment and responsive briefs from 6,250 words to 15,750 words.¹ Both Plaintiff and the UNC-Defendants agree that, in light of the complexity of the issues in this case, these enlargements are reasonably necessary in order to adequately address the issues presented and present the extensive factual record evidence.

WHEREFORE, the Plaintiff and UNC-Defendants respectfully request that the Court grant Plaintiff and UNC-Defendants leave to file a brief in support of any motion for summary judgment and corresponding responsive brief of no more than 15,750 words each.

¹ In light of Rule 7.3(d)'s use of word count, the parties have requested relief in those terms here. For reference, 6,250 words equates to 30 double sided pages using size 13 Times New Roman font. The requested relief of 15,750 words equates to approximately 75 pages.

Respectfully submitted this 22nd day of August, 2018.

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Respectfully submitted this 22nd day of August, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Joint Motion to Extend Limitation on Length of Briefs via the Court's electronic filing systems, pursuant to the Electronic Filing Procedures, on all attorneys of record who have entered an appearance by ECF in this matter.

This 22nd day of August, 2018.

/s/ Lara Flath
Lara Flath